



CITY OF GREENLEAF

20523 North Whittier Drive
Greenleaf, Idaho 83626



20 August, 2009

Leonard Herr
Idaho Department of Environmental Quality
Boise Regional Airshed Manager
1445 North Hilton
Boise, Idaho 83706

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SEP 01 2009

DEPARTMENT OF
ENVIRONMENTAL QUALITY
BOISE REGIONAL OFFICE

RE: RESPONSE REGARDING PLANS FOR A VEHICLE INSPECTION AND MAINTENANCE PROGRAM, PURSUANT TO IDAHO CODE 39-116B (2008 HB #586 VEHICLE EMISSIONS TESTING LEGISLATION)

Greetings!

Please accept this letter as an official response to the Idaho Department of Environmental Quality's (DEQ's) written notice requesting that effected parties enter into a joint powers agreement to implement a vehicle inspection and maintenance program, or to present an acceptable alternative vehicle emissions control program.

The city has taken its' responsibility regarding this issue seriously. At my direction, the city's Public Services Director attended meetings to negotiate a joint powers agreement with effected parties and took an active role in these discussions. The City Council has discussed this issue in several Council meetings, and held a public hearing on 21 July 2009 to gather input from the community on this subject.

The preservation of air quality in the Treasure Valley is both an important and a difficult task. The City of Greenleaf is willing to do its' part within a larger negotiated effort – However, with population under 1000, the city must also recognize it's limited resources and inability to effectively impact air quality in the Treasure Valley air-shed through stand-alone efforts. It is unfortunate that the larger players at the table found themselves unable to continue with development and participation in a negotiated joint powers agreement.

During discussion, the City Council has identified that adopting a no-idle zone for vehicles within the City Limits and adopting an open burning ban for the summer months are practical steps which could be taken. However, without an identified funding source, the city does not have resource to further address vehicle emissions without placing an undue regulatory burden upon the city's business community and residents.

The city is also concerned that vehicle emissions are a minor source of violate organic contaminants (VOCs) when compared to naturally occurring and industrial/commercial sources. Recognizing that it would take considerable political will at the state level to do so, the city believes addressing the largest contributors to the VOC problem, rather than

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burdening the general public to reduce a minor source, would better serve preservation of the Treasure Valley's air quality.

It is the city's understanding that Idaho Code 39-116b provides three options. The first option, development of a negotiated joint powers agreement, failed to win favor with the larger players in the discussion. The second option, an alternative plan from the City of Greenleaf, is impractical due to the city's small size and lack of available resource. This leaves the third option, development and implementation of a vehicle emissions plan by DEQ.

As I'm sure you're aware, the City of Greenleaf was an early adopter, if not the first in the Treasure Valley, to put an ordinance in place to ban open burning when the DEQ Air Quality Index is at or above 60. The city has been, and continues to be, open to active partnership with other agencies for effective and fiscally responsible efforts to preserve air quality in the Treasure Valley.

Thank you,

Bradley Holton
Mayor
City of Greenleaf

BH/lcb

cc City Council
 City Attorney
 City Engineer
 Public Services Director